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August 9, 2024

VIA ECF

Hon. Sarah Netburn, U.S.M.J.
United States District Court
Southern District of New York
40 Foley Square, Room 430
New York, NY 10007

Re: *Arthur Balder v. Susan Sarandon, et al*, Case No.: 1:22-cv-06401-JLR-SN

Hon. Judge Netburn:

We represent Defendants Susan Sarandon, Honey Shara, David Shara and Tigran Tsitoghdzyan (collectively, “Defendants”) in this action. This letter motion is submitted pursuant to Sections I(B) and (G) of Your Honor’s Individual Practices in Civil Cases. We write to respectfully request that the Court adjourn the deadline for Plaintiff Arthur Balder (“Plaintiff”) and Defendants (Plaintiff and Defendants collectively, the “Parties”) sine die to file a motion to enforce the settlement, currently due August 9, 2024 (the “Motion”). This is the third request concerning the deadline for the Motion, and both prior requests for extensions of this deadline were granted by the Court [Dkt. Nos. 145, 148].

The Parties currently have until August 9, 2024, to file any respective Motion. [Dkt. No. 148]. However, the Parties are still in the process of finalizing the written settlement agreement before it can be circulated for signature. As such, since the Parties only need a short amount of time to finalize the settlement agreement and consummate same, the Parties agree that it would be a waste of the Court’s and the Parties’ resources for the Parties to file any respective Motion at this time.

As such, we respectfully request that the deadline for the Parties to file any respective Motion be adjourned sine die, and if the stipulation of dismissal is not filed by Wednesday, August 14, 2024, the Parties will submit a status report to the Court and request a new deadline be set for the Parties to file any respective Motion.

Counsel for Defendants has conferred with Plaintiff, and all Parties are in agreement with the relief sought herein.

This request for an extension was not made at least 48 hours before the current deadline, because the Parties reasonably believed that the settlement agreement would have been finalized by today. However, given that there are a few final details that are being worked out between the Parties,

the Parties agreed to submit this extension request so that the Parties had sufficient time to finalize and execute the written settlement agreement.

We greatly appreciate your Honor's time and consideration in this matter, and should the Court need any further information we are happy to provide such and are available at the Court's convenience.

Respectfully Submitted,

ADELMAN MATZ P.C.

A handwritten signature in black ink, appearing to read "Barry M. Golden".

Barry M. Golden Esq.

Cc. Arthur Balder (via ECF pursuant to Court Authorization)